

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 03283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYMENT RETIREMENT SYSTEM
OF THE COMMONWEALTH OF PUERTO RICO
("ERS"),

Debtor.

PROMESA
Title III

No. 17 BK 03566-LTS

**INFORMATIVE MOTION OF ERS INDIVIDUAL PLAINTIFFS REGARDING HEARING
PROCEDURES FOR SEPTEMBER 21, 2022 OMNIBUS HEARING**

TO THE HONORABLE COURT:

Individual Plaintiffs, Pedro José Nazario Serrano; Joel Rivera Morales; María de Lourdes Gómez Pérez; Héctor Cruz Villanueva; Lourdes Rodríguez and Luis M. Jordán Rivera, all of them Retirees/Beneficiaries of the ERS and Plaintiffs in a claim for damages described

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as bankruptcy case numbers due to software limitations).

below that is currently pending in the Commonwealth of Puerto Rico Court of First Instance, San Juan Part (the “Commonwealth Court”), without submitting to the jurisdiction of this Court, respectfully submits this informative motion in response to the Court’s Order Regarding Procedures for September 21-22, 2022 Omnibus Hearing [ECF No. 22038] (the “Scheduling Order”) and respectfully states as follows:

1. Harold D. Vicente-Colón and Francisco Pujol Meneses will appear on behalf of the ERS Individual Plaintiffs at the Hearing (as defined in the Scheduling Order) and reserve the right to address, as necessary, the following matters:

- a. Motion to Stay Consideration of: “UBS Financial Services Incorporated of Puerto Rico’s Motion to Enforce the Plan of Adjustment and for Related Injunctive Relief” [DE 21808 filed in Case No. 17-BK-3283-LTS];
- b. Consolidated: (1) Reply to Opposition to Motion to Stay and (2) Opposition to Motion to Enforce the Plan of Adjustment [DE 22175 filed in Case No. 17-BK-3283-LTS];
- c. Brief Reply To: (1) Official Committee of Unsecured Creditors Limited Response in Support of UBS Financial Services Incorporated of Puerto Rico’s Motion to Enforce the Plan of Adjustment [Docket No. 22186] and to (2) Joinder of the Avoidance Actions Trustee to Official Committee of Unsecured Creditors’ Limited Response in Support of UBS Financial Services Incorporated of Puerto Rico’s Motion to Enforce the Plan of Adjustment [Docket No. 22187] [DE 22199 filed in Case No. 17-BK-3283-LTS].

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That on this same date a true and exact copy of this motion was filed with the Clerk of Court using CM/ECF system, which will notify a copy to counsel of record.

In San Juan, Puerto Rico, this 15th day of September 2022.

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